

MEMORANDUM ENDORSED



May 16, 2025

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Via ECF

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Hon. Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

RE: Abadi v. NYU Langone Health System, et al., 1:21-cv-11073-RA-GWG

Dear Magistrate Judge Gorenstein:

We represent the Defendants in this action brought by *pro se* plaintiff, Aaron Abadi. We write to respectfully a short extension of the deadline for Defendants to file their motion for summary judgment. The deadline for Defendants to move for summary judgment is currently May 16, 2025. (Dkt. 120). We contacted Plaintiff to seek his consent, but have not heard back. Based on our prior requests, we expect Plaintiff to oppose Defendants' application.

In support of this application, Defendants state as follows: The primary reason for the requested extension is that the supervising partner of this case, Roy Breitenbach, is currently in the hospital with his wife coordinating her discharge and care for when she returns home. We are also waiting for one client declaration to be signed. Defendants' motion for summary judgment is otherwise complete, and Mr. Breitenbach will approve the filing of same when he returns to the office.

Accordingly, Defendants respectfully request a final three-day extension of the summary judgment filing deadline from May 16, 2025 to May 21, 2025. We sincerely apologize to the Court for the delays.

As always, we thank the Court for its time and consideration.

Respectfully,

/s/ Christine Vasconcellos

Christine Vasconcellos

Any motion for summary judgment is returnable before Judge Abrams, shall comply with her Individual Practices, and shall be filed by May 21, 2025. With regard to plaintiff's letter (Docket # 137), if plaintiff wishes to withdraw his pending motion and file a new motion on May 21, 2025, he is free to do so. The Court will not, however, delay the deadline for filing of summary judgment motions to allow plaintiff to "resolve" unnamed "discovery issues" (Docket # 137) as there has been no proper application to the Court regarding any such issues and there is every indication based on the current record before the Court that any effort to present such issues now would be untimely.

So Ordered.



GABRIEL W. CORENSTEIN
United States Magistrate Judge

May 16, 2025